

## UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

In the Matter of the Tracking of  
 (Identify the person to be tracked or describe  
 the object or property to be used for tracking)

2010 White Chevrolet Traverse,  
 Ohio Registration JEH1591  
 VIN 1GNLRGED0AS131689

Case No.

2:21-mj-125

## APPLICATION FOR A TRACKING WARRANT

I, a federal law enforcement officer or attorney for the government, have reason to believe that the person, property, or object described above has been and likely will continue to be involved in one or more violations of 21 U.S.C. § 846. Therefore, in furtherance of a criminal investigation, I request authority to install and use a tracking device or use the tracking capabilities of the property or object described above to determine location. The application is based on the facts set forth on the attached sheet.

- ☒ The person, property, or object is located in this district. ☐ The activity in this district relates to domestic or international terrorism.
- ☐ The person, property, or object is not now located in this district, but will be at the time of execution. ☐ Other:

The tracking will likely reveal these bases for the warrant under Fed. R. Crim. P. 41(c): (check one or more)

- ☒ evidence of a crime; ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime; ☐ a person to be arrested or a person who is unlawfully restrained.

☒ I further request, for purposes of installing, maintaining or removing the tracking device, authority to enter the following vehicle or private property, or both:  
 2010 White Chevrolet Traverse, Ohio Registration JEH1591, VIN 1GNLRGED0AS131689

☒ Delayed notice of 30 days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*antonio kelly*  
 Applicant's signature

Antonio Kelly, Special Agent, DEA

Applicant's printed name and title

Sworn to before me and signed in my presence.

Date: February 24, 2021

City and state: Columbus, OH

*Kimberly A. Tolson*  
 Kimberly A. Tolson

United States Magistrate Judge



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH/TRACKER WARRANT**

I, Antonio T. Kelly, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the Drug Enforcement Administration (hereinafter referred to as "DEA") assigned to the Detroit Field Division, Columbus District Office. As such, I am an "investigative or law enforcement officer" within the meaning of 18 U.S.C. § 2510(7), that is, an officer of United States empowered by law to conduct criminal investigations and to make arrests for offenses enumerated in 18 U.S.C. § 2516. I have been employed by the DEA since August 21, 2016. As a Special Agent, I am empowered to investigate, to make arrests with or without warrants, and to execute search warrants under the authority of 21 U.S.C. § 878.

2. Prior to being employed by the DEA, I was employed by the Bureau of Prisons in Williamsburg, South Carolina, from March 2008 to August 2016. I also held various law enforcement positions from 2005 to the present, including with the Charleston County Sheriff's Office in Charleston, South Carolina. During this time, I have accumulated the following training and experience:

(a) I graduated from the DEA Academy in Quantico, Virginia, on February 3, 2017. I received approximately 20 weeks of training including controlled substances identification, interview and interrogation training, preparation of search warrants, tactical application of narcotics enforcements, tactical undercover training, surveillance and electronic monitoring techniques, money laundering investigations training, and various forensics subjects including latent fingerprint collections and analysis.

(b) During my law enforcement career, I have participated in and conducted numerous criminal investigations, including those involving possession with intent to distribute controlled substances, distribution of controlled substances, and conspiracy to possess with the intent to distribute and to distribute controlled substances, in violation of 21 U.S.C. §§ 841 and 846. These investigations have resulted in arrests of individuals who have possessed with the intent to distribute and distributed marijuana, cocaine, cocaine base, heroin, methamphetamine, and MDMA, as well as other controlled substances. These investigations have also resulted in seizures of illegal drugs and proceeds from the distribution of those illegal drugs.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**FACTS ESTABLISHING PROBABLE CAUSE AND NEED FOR THIS APPLICATION**

4. In May 2020, members of the Columbus District Office (CDO) initiated an investigation into the Sara GARCIA Money Laundering Organization (MLO), operating in the Columbus Ohio area. GARCIA has been identified as the head of the Organization.

5. Based on traffic stops, search warrants, and two undercover money pickups, totaling \$124, 500 in suspected drug proceeds that occurred on May 11, 2020 and November 12, 2020, the MLO launders drug proceeds and distributes fentanyl in Columbus and surrounding areas.

6. On November 23, 2020, Ohio State Highway Patrol initiated a traffic stop on GARCIA's vehicle due to a traffic violation. GARCIA was positively identified as the driver of the vehicle and Oscar Daniel CAMACHO-GARCIA was positively identified as the front passenger in the vehicle. At this time, an OSHP K-9 was deployed and alerted to a positive scent of illegal narcotics. After the positive alert from the K-9, GARCIA and CAMACHO-GARCIA were both read their Miranda warnings in which they both understood and complied. GARCIA and CAMACHO-GARCIA were then placed under investigative detention and placed in an OSHP mark unit.

7. A subsequent search of the vehicle resulted in the seizure of approximately 13.9 pounds marijuana, plastic bags containing methamphetamine residue, scales containing methamphetamine residue, drug paraphernalia, a vacuum sealer, keys to a safe, AR-15 magazines, and boxes of .223 Remington ammunition. The marijuana seized was found in the trunk of the vehicle in the same box agents observed CAMACHO-GARCIA carrying out the rear entrance of 612 East 2<sup>nd</sup> Avenue, Columbus, Ohio, prior to the traffic stop.

8. As a result of the traffic stop, agents were granted authorization to execute a federal search warrant at 612 East 2<sup>nd</sup> Avenue. On November 23, 2020, members of the CDO executed this search warrant and seized approximately 80 kilogram wrappers containing cocaine residue and a hydraulic press covered in cocaine residue located in the basement of the residence, among other items. One of these items seized was approximately one ounce of fentanyl located in a safe in the living room area of the residence. After the search of the residence was complete, GARCIA and CAMACHO-GARCIA were released.

9. Based on my training and experience and the training and experience of other law enforcement officers involved in this investigation, as well as my knowledge of this

investigation, it is law enforcement belief that members of this MLO were using 612 East 2<sup>nd</sup> Avenue for the purpose of distributing large amounts illegal narcotics.

10. On January 06, 2021, members of the CDO contacted the owner of 612 East 2<sup>nd</sup> Avenue and was informed by the owner that Edith HERRERA rented the residence from October 23, 2020, to November 23, 2020. Edith HERRERA is known to law enforcement as Edith Joanna HERRERA-GARCIA and is known as GARCIA's daughter. Based on my training and experience and the training and experience from other law enforcement officers, I know that narcotics traffickers often utilized residences for short periods of time for the purpose of distributing illegal narcotics and place these residences in names other than their own to avoid detection by law enforcement.

11. In addition, HERRERA-GARCIA has been known to be associated with the distribution of illegal narcotics. In June, 2020, Ohio HIDTA Interdiction seized a UPS package containing 2,600 Oxycodone, 30 milligram pills of suspected fentanyl, destined to 491 Candlestick Court, Apartment A, Galloway, Ohio. At the time the package was seized, HERRERA-GARCIA was the listed owner of the residence. HERRERA-GARCIA was observed by law enforcement entering and exiting the residence of 491 Candlestick around the time the package was seized by HIDTA.

12. On January 20, 2021, members of the CDO observed HERRERA-GARCIA driving a 2008 gray Honda Civic, bearing Ohio registration HRK3046, in the area of Abbot's Cove Apartment. CAMACHO-GARCIA was observed in the front passenger seat of the vehicle. During this time, agents observed HERRERA-GARCIA arrive in the Honda Civic at GARCIA's residence of 73 North Harris Avenue. At this time, agents observed HERRERA-GARCIA and COMACHO-GARCIA enter into the rear entrance of the residence.

13. According to a law enforcement database, GARCIA is the listed owner of the Honda Civic operated by her daughter HERRERA-GARCIA. This bolsters law enforcement's belief that HERRERA-GARCIA has knowledge of GARICA's criminal activity and is involved in the distribution of illegal narcotics. As previously stated, HERRERA-GARCIA was the listed person who rented the residence where agents executed the search warrant on November 23, 2020 and seized the aforementioned illegal narcotics.

14. On January 21, 2021, agents applied for a federal search warrant and were granted authorization to install an electronic mobile device on GARCIA's Honda, driven by HERRERA-GARCIA. From January 21, 2021, until the present day, agents are unable to locate the Honda.

15. On February 09, 2021, at approximately 4:15 p.m., agents observed GARCIA's vehicle and a White Chevrolet Traverse, Ohio registration JEH1591 park at the rear of 949 East Long Street, Columbus, Ohio. Through investigative efforts and knowledge from other law enforcement officials involved in this investigation, it is agent's belief that 949 East Long Street is a location used by GARCIA for the distribution of illegal narcotics. At approximately 5:00 p.m., agents observed GARICA's vehicle and the Chevrolet Traverse depart 949 East Long Street in tandem. At this time, agents observed a Hispanic female in the driver seat of the Chevrolet Traverse, who agent's believed to be HERRERA-GARCIA.

16. Specifically, on February 09, 2021, members of the High Intensity Drug Trafficking Areas (HIDTA Interdiction) indicted an individual who resided at 949 East Long Street on charges of Conspiracy to Distribute a Controlled Substance. This bolsters the information thereof that 949 East Long Street is a location used for facilitating, distributing and/or storing illegal narcotics.

17. On February 23, 2021, agents also observed HERRERA-GARCIA driving the Chevrolet Traverse. During this time, GARCIA and an unknown Hispanic male were also observed as the passenger inside the vehicle. At approximately 3:15 p.m., agents observed HERRERA-GARCIA arrive in the Chevrolet Traverse at GARCIA's residence of 73 North Harris Avenue, Columbus, Ohio. At this time, agents observed GARCIA and the unknown Hispanic male exit the vehicle and enter into the rear entrance of GARCIA's residence.

18. On February 23, 2021, at approximately 3:55 p.m., agents observed HERRERA-GARCIA arrive at her residence of 2886 Abbots Cove Boulevard, Columbus, Ohio in the Chevrolet Traverse. HERRERA-GARCIA was the only occupant inside the vehicle. At this time, agents observed HERRERA-GARCIA exit the driver seat of the Chevrolet Traverse and key her way into the front entrance of 2886 Abbots Cove Boulevard.

19. According to a law enforcement database, neither GARCIA nor HERRERA-GARCIA is the registered owner of the Chevrolet Traverse. The registered owner of the Chevrolet Traverse is listed as a Hispanic female. Based upon my training and experience and the training experience of other law enforcement officials involved in this investigation, I know that narcotics traffickers commonly drive vehicles not registered in their own name to conceal their identity from law enforcement.

20. In addition, it is agent's belief that HERRERA-GARCIA discarded the Honda she previously drove, due to agents being unable to locate the vehicle. Based upon my training and experience and the training experience of other law enforcement officials involved in this investigation, I know that drug traffickers commonly switch their vehicles to keep from being detected by law enforcement.



21. Based on my training and experience and the training and experience of other law enforcement officials, and based on the aforementioned information, it is agent's belief that Edith Joanna HERRERA-GARCIA is involved in criminal activity along with Sara GARCIA. In addition, it is agent's belief that GARCIA is the head of this Money Laundering Organization (MLO) and her son and daughter, CAMACHO-GARCIA and HERRERA-GARCIA willingly participants in money laundering and the distribution of illegal narcotics operating in Columbus, Ohio, and other surrounding areas.



CONCLUSION

22. Based upon this the facts set forth therein, I request that the Court authorize executing of this warrant, as it is necessary to assist law enforcement in identifying locations **Sara GARCIA** and **Edith Joanna HERRERA-GARCIA** use for the distribution of illegal narcotics, and any other co-conspirators involved in the distribution of illegal narcotics.

21. Consistent with General Order 18-01 of the Southern District of Ohio, I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until the search warrant returned is docketed. These documents discuss and ongoing investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because there premature disclosure may seriously jeopardized that investigation.

Respectfully submitted,

*antonio kelly*

Antonio T. Kelly  
Special Agent  
Drug Enforcement Administration

February 24, 2021

Subscribed and sworn to before me on \_\_\_\_\_, 2021

*Kimberly A. Johnson*  
Kimberly A. Johnson  
United States Magistrate Judge

